

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	
JOHN WAYNE CALLOWAY	:	CASE NO. 1-14-04227-MDF
EARTHENIA DENISE CALLOWAY	:	
Debtors	:	
	:	CHAPTER 13
	:	
LAKEVIEW LOAN SERVICING, LLC	:	
Movant	:	
	:	
v.	:	
	:	
JOHN WAYNE CALLOWAY	:	
EARTHENIA DENISE CALLOWAY	:	
Respondents	:	

**DEBTORS' RESPONSE TO MOTION OF
LAKEVIEW LOAN SERVICING, LLC
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come Debtors, John Wayne Calloway and Earthenia Denise Calloway, by and through their attorney, Gary J. Imblum, and respectfully respond as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted in part, denied in part. The Mortgage speaks for itself. Strict proof is demanded as to the assignment.
5. Admitted.
6. Admitted. Debtors offer to cure the post petition arrearage through an amended Plan.
7. Admitted in part, denied in part. See response to paragraph 6.
8. Denied. Any and all fees and costs related to the Motion for Relief will be resolved as part of the Motion for Relief Court proceeding.

WHEREFORE, Debtors respectfully request that this Honorable Court issue an Order denying the Motion for Relief From Stay.

Respectfully submitted,

/s/ Gary J. Imblum

Gary J. Imblum
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Attorney for Debtors

DATED: 10/21/2016

CERTIFICATION OF SERVICE

I, Carol V. Shay, Paralegal, do hereby certify that I have served a copy of the foregoing DEBTORS' RESPONSE TO MOTION OF LAKEVIEW LOAN SERVICING, LLC FOR RELIEF FROM THE AUTOMATIC STAY upon the following persons by E-Service or by United States Mail, first class, postage prepaid, at Harrisburg, Dauphin County, Pennsylvania, addressed to:

CHARLES J. DEHART III ESQUIRE
CHAPTER 13 TRUSTEE
VIA E-SERVICE

dehartstaff@pamd13trustee.com

JOSHUA I. GOLDMAN, ESQUIRE
KML LAW GROUP, P.C.
COUNSEL FOR MOVANT
VIA E-SERVICE

IMBLUM LAW OFFICE, P.C.

/s/ Carol V. Shay

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DATED: 10/21/2016